

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

UNITED STATES OF AMERICA

Criminal Indictment

v.

JAMES G. MALONEY

No. 1:16-cr-00237-AT-JSA

SENSITIVE DISCOVERY PROTECTIVE ORDER

Upon motion of the United States, the Court being advised as to the nature of this case and disclosure of certain discovery materials and sensitive information contained therein to the defense, it is hereby

ORDERED that, pursuant to Rule 16(d)(1) of the Federal Rules of Criminal Procedure, defense counsel will not reproduce or disseminate to persons not a party to or involved in this case any reports of witness interviews conducted by the government, and any unclassified documents pertaining to the Defendant's work for any defense or intelligence agency that have been produced as Sensitive Discovery Material.

IT IS FURTHER ORDERED that this Sensitive Discovery Material provided by the government shall not be shown to any individuals, organizations, or other entities other than: (a) members of the defense team (i.e., the Defendant, defense counsel, and paralegals, interns, investigators, and secretarial staff employed by defense counsel); and (b) experts and consultants retained by defense counsel to assist in the preparation of the defense. Notice of proposed dissemination to defense experts and consultants shall be provided directly to the Court *ex parte*

and under seal. Each expert and consultant to whom disclosure is made pursuant to this Order shall be provided a copy of this Order and shall be advised that he or she may not further disseminate the materials to anyone.

IT IS FURTHER ORDERED that no one is permitted to disseminate the aforesaid Sensitive Discovery Material to any witness or potential witness. The Defendant may move the Court for relief from this restriction by identifying the particular item(s) that he believes must be shown to a witness and the purpose in doing so. The motion shall be under seal. No disclosure of the item(s) to the witness(es) shall be made until the Court so permits. The Court, at its discretion and after so notifying the Defendant, may consult with the Government regarding any dissemination requests pursuant to this paragraph.

IT IS FURTHER ORDERED that at the conclusion of the litigation of this case, that is, after trial and appeal, if any, defense counsel shall return to the prosecutor assigned to the case at that time all the Sensitive Discovery Material provided in connection with this order, and any copies of those materials.

SO ORDERED, this _____ day of _____ 2017.

JUSTIN S. ANAND
UNITED STATES MAGISTRATE JUDGE